

I have been working in various forms of broadcast media for nearly twenty years, as a DJ at a small station, a recording artist, a radio producer and as a commercial voiceover artist. However today I am writing as a concerned consumer who feels long neglected by the FCC.

As someone who has been in this business for so long, I have come to see a great disparity between the worlds of the creators of broadcast content and their consumers. Increasing ownership consolidation, content filtering and centralization of programming control has severely limited what consumers are allowed access to. To continually allow station owners to erode the relationship between individually localized broadcasting and their listeners is to fail the core purpose of the FCC.

The FCC has a responsibility to individual communities around the country to protect them from having their local voice stolen and replaced by a larger entity.

Enforcing strict guidelines defining local programming not only protects performers and consumers from being shut out, it also protects the broadcasters themselves from their own shortsighted and self-destructive myopic view of the bottom line.

By allowing broadcasters to pay only "lip service" to local content, you are giving them freedom to implode on their own greed. It is already clear that internet and satellite based providers can do "non-local" more effectively than any free broadcast station. It appears to me that allowing broadcasters to further attempt to emulate these alternate media sources will only result in a giant gamble that is guaranteed to lose.

I believe that the FCC, really for the good of the broadcasters themselves as well as the communities they serve, should define and enforce strict local programming requirements, including but not limited to: Local programming decision makers physically present in the markets they serve, at least half of on-air personalities should reside and perform work physically within the broadcast reach of the station, at least a portion of broadcast content should emanate from within the broadcast reach of the station, and any content not generated locally should be identified as such on the half hour.

Local programming should be defined quite simply as content derived specifically from being present within the broadcast reach of the station. This can be broadcasts of local events, station breaks by announcers physically located in the market, or locally generated news and public interest content. They should NOT be allowed to count, for example, local weather provided by the national weather service.

While stations' involvement with non-programming related local events should be encouraged and emphasized as important in a codified way, they should NOT count toward overall localization requirements of the FCC. That would open the door to a pay-for-compliance situation that would fail the intent of FCC mandates.

Modern day "technically legal" payola is another problem that is not only unfair and undemocratic, it is also like a dangerous drug addiction to the broadcasters themselves. It is time for the FCC to step in and perform an intervention. Broadcasters are addicted to the "quick high" of record label

freebies and favors, but the result is that they further lose contact with their "real friends," the audience. Eventually the audience tires of the forcefeeding they receive and look for other outlets such as the internet or satellite. The more the stations ignore the local tastes of the listeners, the more they lose in the end. The cycle then continues to spiral downward as the owners cry "diminishing profits!" and plea for less regulation to stay in business. At some point, the FCC must tell them that they must appeal to consumers to stay in business, not continually ignore them.

It is time for the FCC to address these and other issues not only as a body created to protect citizens from "big brother" mass messaging, but also to guide the broadcasters into essentially "eating their vegetables." Short term cost savings and short cuts to big profit are an all-sugar diet that will eventually kill broadcast media as we know it. The FCC must work for the good of all in preventing that from happening.

Thank you for considering these thoughts and the purpose that you as a body serve to our nation.